

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
LYNCHBURG DIVISION

CALVIN WESLEY,)	
)	
Plaintiff,)	
)	
v.)	Civil Action: 6:23cv00012
)	
CITY OF LYNCHBURG, <i>et al.</i>)	
)	
Defendants.)	

DEFENDANTS' MOTION FOR LEAVE TO EXCEED 25 PAGES ON BRIEF

Defendants City of Lynchburg, Virginia, and Officer Seth Reed, by counsel, move for leave to exceed the 25 page limit for briefs contained in the Court's pretrial order and in support thereof state as follows:

1. Defendants are filing a joint motion for summary judgment and memorandum in support of the motion.
2. Plaintiff has alleged liability based on two separate incidents and numerous legal theories of recovery against multiple defendants. Defendants' memorandum includes descriptions of the two incidents in the section setting forth the undisputed facts of the case and legal argument on numerous legal theories from the perspective of the individual officers and the City of Lynchburg.
3. As a result, the memorandum will exceed 25 pages but is not expected to exceed 40 pages.
4. Judicial economy will be served by the filing of the joint motion and memorandum thereby justifying the requested increase in page limits.

WHEREFORE, Defendants respectfully request leave to file a memorandum no more than 40 pages in length in support of their joint motion for summary judgment.

CITY OF LYNCHBURG, SETH REED, AUSTIN
ROWLAND, and COLLIN BRYANT

By /s/ John R. Fitzgerald
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CERTIFICATE OF SERVICE

I hereby certify that on the 28th day of December, 2023, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system.

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